

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>Crim. No. 05-186 (RJL)</b>
<b>v.</b>	:	
	:	
	:	<b>Sentencing</b>
<b>GREGORY A. GOODING,</b>	:	<b>January 20, 2006</b>
	:	
<b>Defendant.</b>	:	

**GOVERNMENT’S MOTION FOR GUIDELINES CREDIT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves the Court, pursuant to Section 3E1.1(b) of the United States Sentencing Guidelines and Paragraph 8 of the plea agreement between the Government and Defendant Gregory A. Gooding, to adjust Defendant Gooding’s offense level down one level to reflect Defendant Gooding’s early plea of guilty in this matter.

As grounds for this motion, the Government states that Defendant Gooding assisted authorities in the investigation or prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the Government to avoid preparing for trial and permitting the Government and the Court to allocate their resources efficiently. Defendant Gooding was indicted on May 19, 2005, and entered a guilty plea on October 14, 2005. As a consequence, the resources of this Court, the United States Attorney’s Office, the United States Marshals Service, and Metropolitan Police Department were conserved. The United States Attorney’s Office, the United States Marshals Service, and the Metropolitan Police Department did not have to expend time, energy and resources in preparing for trial in this matter. Court time was conserved as well.

WHEREFORE, the Government respectfully submits that pursuant to Section 3E1.1(b) of the Sentencing Guidelines, it is appropriate in this case to reduce Defendant Gooding's offense level by one level to reflect his early entry of a plea of guilty in this matter.

KENNETH L. WAINSTEIN  
United States Attorney

BY:

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